

Exhibit 1



MEMORANDUM

TO: Gerald Evelyn, Esquire
Attorney for William Smith

FROM: Meredith Patti, Esquire
Mary Cate Rush, Chief Statistician

DATE: April 10, 2025

SUBJECT: SMITH – ANALYSIS OF JSIN FINDINGS IN PRESENTENCE INVESTIGATION REPORT

We were asked to review and analyze the findings contained in paragraph 119 of William Smith's Presentence Investigation Report (PSR). This request was made in order to get more information about the cases described in that paragraph and determine whether these cases were in fact similar to Mr. Smith. Paragraph 119 utilizes JSIN, an online tool that provides users with sentencing information based on certain criteria.

On September 28, 2021 the United States Sentencing Commission (USSC) made available on its website a sentencing resource entitled Judiciary Sentencing Information (JSIN). JSIN was created to provide federal judges with national sentencing data. JSIN analyzes the last five fiscal years of sentencing data (currently FY 2019 – FY 2023) for offenders sentenced under the same primary guideline, Total Offense Level, and Criminal History category. For the purpose of calculating the average and median prison length, JSIN excludes all defendants who received a substantial assistance downward departure pursuant to USSG §5K1.1 and also has the ability to exclude defendants who were convicted of certain statutes that are subject to a mandatory statutory minimum sentence (specifically, 18 USC §924(c) and 18 USC §1028A).

As described in paragraph 119 of Mr. Smith's PSR, the user imputed the following information: USSG §2S1.1; Total Offense Level 36; and Criminal History Category I. Pursuant to the default settings, defendants who received a substantial assistance downward departure according to USSG §5K1.1 were excluded as well as defendants convicted of violating either 18 USC §924(c) or 18 USC §1028A. As stated in paragraph 119, selecting this criteria generated the following JSIN findings:

According to the Judiciary Sentencing Information (JSIN) platform, during the last five fiscal years (FY2019-2023), there were 25 defendants whose primary guideline was §2S1.1, with a Final Offense Level of 36 and a Criminal History Category of I, after excluding defendants who received a §5K1.1 substantial assistance departure. For the 25 defendants (100.0%) who received a sentence of

imprisonment in whole or in part, the average length of imprisonment imposed was 131 month(s) and the median length of imprisonment imposed was 120 month(s). For all 25 defendants in the cell, the average sentence imposed was 131 month(s) and the median sentence imposed was 120 month(s).

Information in JSIN is obtained from the Oracle database maintained by the USSC. The USSC maintains a comprehensive, computerized data collection system of federal sentencing information.¹ Pursuant to 28 USC §994(w) each chief judge of a district is required to ensure that within 30 days after entry of judgment in a criminal case the sentencing court submits a report of the sentence to the Commission that includes: (1) the judgment and commitment order; (2) the statement of reasons (including the reasons for any departures or variances); (3) any plea agreement; (4) the indictment or other charging document; (5) the presentence report; and (6) any other information the Commission needs. As this information is received by the USSC it is entered into an Oracle database. From this information, the USSC releases annually a database of sentencing information for individual defendants sentenced during that fiscal year (Individual Offenders Datafiles).

MCM Data Consulting utilized the USSC's Individual Offender Datafiles (FY 2019 – FY 2023) and we selected cases using the same criteria as the criteria selected by the user in paragraph 119 of Mr. Smith's PSR. Specifically, we selected only those defendants who were scored according to USSG §2S1.1, Total Offense Level 36, and Criminal History Category I. Pursuant to the default settings, defendants who received a substantial assistance downward departure according to USSG §5K1.1 were excluded as well as defendants convicted of violating either 18 USC §924(c) or 18 USC §1028A. This resulted in locating the 25 cases described in Paragraph 119 of Mr. Smith's PSR.

Upon review of these 25 cases, we discovered that the majority of these cases are not in fact similar to Mr. Smith:

- In order to calculate the defendant's base offense level, USSG §2S1.1 directs the scorer to the guideline for the underlying offense from which the laundered funds were derived. As stated in Mr. Smith's PSR, the scorer is directed to USSG §2B1.1 to calculate his base offense level. Upon review of the 25 cases found in JSIN, we learned that in 9 of these 25 cases the defendant's base offense level was not calculated using USSG §2B1.1.²

¹ This data collection can be found at <http://www.ussc.gov/research/datafiles/commission-datafiles>.

² In 7 of the 9 cases, the defendant's base offense level was calculated using USSG §2D1.1 – Unlawful Manufacturing, Importing, Exporting, or Trafficking, or Possession with Intent to Commit these Offenses. In one (1) case, the defendant's base offense level was calculated using USSG 2B5.3 – Criminal Infringement of Copyright or Trademark and in one (1) case the defendant was not referred to any guideline for the calculation of base offense level.

Therefore these 9 cases are not similar to Mr. Smith and we therefore excluded these cases (16 cases remain).

- Mr. Smith entered into a plea agreement thereby accepting responsibility for his actions and saving the government the time and expense of preparing for trial. As such, his guideline calculation was decreased by 3-levels according to USSG §3E1.1(a) and (b). Upon review of the 16 remaining cases, we learned that the defendant was convicted after trial in 10 of these cases and therefore did not receive a 3-level decrease under USSG §3E1.1(a) and (b). Because these 10 defendants are not similar to Mr. Smith we excluded them (6 cases remain).
- Mr. Smith has no prior criminal history (zero criminal history points). Upon review of the 6 remaining cases we determined that although all of these 6 defendants were Criminal History Category I, 2 of these defendants did have some criminal history (had a criminal history point). Given the USSC's acknowledgement that defendants with no criminal history should be treated differently than defendants with some criminal history (as shown in the USSC's recent amendment for a deduction in a defendant's guideline calculation for certain zero criminal history point offenders), the 2 defendants with some criminal history are not similar to Mr. Smith and we therefore excluded them (4 cases remain).

Findings

- All four (4) defendants were sentenced to some term of imprisonment.
- The average sentence imposed on these 4 defendants was 100.5 months of imprisonment.
- The median sentence imposed on these 4 defendants was 87.0 months of imprisonment.
- None of these 4 defendants were sentenced in the Sixth Circuit.

Exhibit 2

**The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Rm. 248
Detroit, MI
48226**

Your honor,

I only know Mr. Smith to be an honorable individual. I have known Mr. Smith since 2010. From the day I met him, he has always come off to me as being sincere. Despite his mishaps I can't view him in another light. I have watched him first hand help people that were truly in need. I've witnessed him single handedly change people's lives. While I can't speak to his shortcomings I can speak to his character. He is a proud father and a loving son, brother, husband, and friend. While I have never asked Mr. Smith for anything he has voluntarily helped me out in many different situations.

I know in a perfect world we all would make the right decisions all the time, but I also understand that at times we all fall short. The harsh reality is that we all make mistakes. Some greater than others. Your honor, I understand that you have a job to withhold the law but ask for your grace when judging Mr. Smith. I haven't had a conversation with him about this situation, but I'm sure that he has come to grips with the fact there are consequences for our actions, and knows he has great remorse. In my humble opinion I feel that Mr. Smith has done far more good than he has done bad in his time here on earth.

Your honor your judgement is an extension of God's. I hope that you could find it in your heart to allow Mr. Smith the opportunity to pay his debt to society and still be able to come home and contribute to his loved one's lives. I hope that he will have the time to mentor to the younger generation about the importance of making the right choices especially when you are in a privileged position. He is an asset to our society. Your honor, thank you in advance for your grace and mercy on Mr. Smith's life.

Respectfully,

Iman S. Hoggard

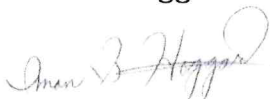


Exhibit 3

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Dear Judge DeClercq,

My name is Gabrielle Wiggins, though many know me as the recording artist Brielle Lesley. I am a proud Detroit native, and at 34 years old, I have had the privilege of knowing William Smith for nearly half my life. I first met William when I was 17 years old, performing as an opening act for the River Days Festival. Later, I worked at Duo Restaurant & Lounge for over eight years, where I witnessed firsthand the incredible man that he is, not just in business, but in his heart, his character, and his relentless dedication to uplifting others.

It is nearly impossible to fully capture in one letter just how incredible William Smith is, but I will try. He is the kind of man who doesn't just talk about change he makes it happen. He has created opportunities where none existed, offered second chances to those society had given up on, and provided stability to those who had nowhere else to turn. He has employed people who were down on their luck, mentored those searching for purpose, and fed those who didn't know where their next meal would come from. He has given shelter to the homeless, guidance to the lost, and unconditional support to anyone in need, never once asking for anything in return.

William has a rare and selfless spirit. He is a natural leader not because he demands to be followed, but because people trust him, respect him, and are drawn to his wisdom. His presence alone has a way of making people feel safe, seen, and valued. He has an incredible ability to recognize potential in others, even when they can't see it in themselves. And when he believes in you, he makes sure you know it. I know this because I am one of those people.

In 2014, I lost my father. That kind of loss changes you forever. It leaves you with a void that no one can truly fill. But in the years that followed, without ever trying to replace my father, William became the father figure I didn't realize I needed. He has been my mentor, my protector, and my biggest supporter. When I doubted myself, he reminded me of my worth. When I struggled, he was there with encouragement, wisdom, and the kind of unwavering faith in me that gave me the strength to keep going. His love and guidance have shaped me in ways I can never fully express. And I know I am not alone.

To many, William is more than just a friend, he is family. To some, he is the only family they have. He has been a father figure to the fatherless, a brother to those in need, and a pillar of strength to an entire community. He has spent his life helping others, giving more than he has, and always putting people before himself. He has changed lives, restored faith, and been a guiding light for so many who might have otherwise been lost.

You don't meet people like William Smith often in life. When you do, you realize that they are a gift a rare example of kindness, sacrifice, and unwavering dedication to others. His heart, his character, and his impact cannot be overstated. God works through people, and William is one of those rare individuals through whom God has often worked. To know him is to love him and to be loved by him.

I could go on forever about the man he is, but if there is one thing I need you to know, it is this: William Smith is not just important he is NECESSARY! His presence in this world, in this community, and in the lives of so many people, including my own, is invaluable. William Smith is not just a man. He is a lifeline for so many people. His impact matters. The world—and my world—is better because he is apart of it. God used William to bring people hope, and access to unconditional love and a safe place, and to be used by GOD, is a rare gift, but if you were fortunate enough to have a piece of William in your life, you are indeed one of GODS favorite.

Thank you for taking the time to read my letter. I sincerely hope it offers a deeper understanding of the man William Smith truly is and inspires a new perspective.

Sincerely,
Gabrielle Wiggins
January 25, 2025

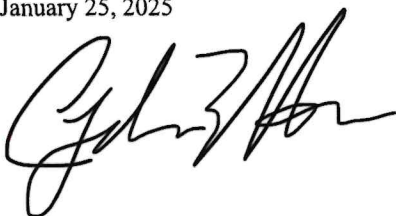
A handwritten signature in black ink, appearing to read 'Gabrielle Wiggins' with a stylized, cursive script.

Exhibit 4

Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd. Room 248
Detroit MI 48226

1/30/25

Dear Judge DeClercq,

I am writing to you with a heartfelt recommendation for Mr. Smith. My eight years working alongside him – both as a colleague and employee – afforded me unparalleled opportunities for growth and development. His leadership style was exceptional. He cultivated a remarkably supportive and collaborative work environment where every team member felt valued and empowered. This wasn't just about providing opportunities for advancement; Mr. Smith actively nurtured our professional skills. His mentorship, particularly in entrepreneurial strategies, provided invaluable hands-on experience that continues to shape my career path today. He didn't just delegate tasks; he invested in his team, fostering a culture of mutual respect and learning.

While I understand there are serious concerns regarding recent events, I want to offer a counterpoint based on my extensive experience with Mr. Smith. These events, while regrettable, do not define the exceptional character and unwavering commitment to excellence I witnessed during our time working together. He possesses a remarkable ability to inspire and motivate, creating a positive atmosphere where innovation thrived. His dedication to his employees was consistently evident, and his guidance has had a profound and lasting impact on my career. Given the totality of my experience, I genuinely believe that Mr. Smith deserves the opportunity to learn from this situation and demonstrate his capacity for growth and redemption.

Sincerely,

Niambi Blair

Niambi Blair

Exhibit 5

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

I am composing this letter with a profound sense of appreciation and hope that you will take a moment to read it. My name is Timmora Jackson, and I have been fortunate to know William Smith for several years. Working alongside someone who consistently shows understanding, compassion, and a willingness to provide invaluable guidance has been one of the most fulfilling aspects of my career. His insight and wisdom have greatly assisted me in navigating difficult situations.

I have never ended a conversation with him without feeling motivated to better myself or gaining a clearer understanding of how to handle challenging circumstances with grace. While the charges he is facing are extremely serious, I genuinely believe that William feels both embarrassment and deep remorse regarding this matter. It saddens me greatly to see a man who has dedicated himself to helping others grow mentally, spiritually, and emotionally being subjected to judgment and criticism.

William is an integral part of our community, regularly providing resources to support those in need. His expertise in various areas has been incredibly valuable to both myself and many others. For example, my 15-year-old son, who has been playing football for six years, has benefited from his excellent guidance and advice about the sport, including introductions to camps and scholarship opportunities.

I recognize that the offense he is being accused of is serious, and I do not seek leniency without a careful consideration of the circumstances. I kindly request your understanding and compassion for a man who has positively impacted many lives, including my own. William is the kind of person who would selflessly extend help to his peers.

It breaks my heart that someone who has consistently shown kindness and concern for others is now facing such a challenging situation. I am confident that his intentions have always been genuine towards everyone he has met. I trust that you will take into account the positive contributions he has made when reflecting on this unfortunate incident and grant some degree of leniency in your decision-making. Thank you for your time and consideration.

Sincerely,
Timmora Jackson

Exhibit 6

1/30/25

Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd. Room 248
Detroit, MI 48226

Re: William A. Smith

Dear Judge DeClercq,

My name is Frank Simmons III. I was an employee for Mr. Smith for approximately 9 years and a few months. During my tenure working under his leadership, I witnessed many great things that he has done for his community, friends, family, employees etc.

Mr. Smith provided so many opportunities! Especially when Covid 19 struck the world. While many employers let go of workers. Mr. Smith made sure we were taken care of. That meant a lot to me especially during one of the roughest moments in my life.

I still look up to him. He has one of the biggest hearts. Its reflection is displayed through the many people that he showed compassion and helped on countless occasions.

Although this is a sad state of affairs, I truly believe that he is one of the greatest men I've ever met. I am truly grateful for him. We all make mistakes and no one is perfect. So I am pleading that he is allowed grace to learn from this mistake because it is not a true definition of the man and the character that is currently on display.

Humbly,

Frank Simmons III

Frank Simmons III

Exhibit 7

January 6, 2025

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd.,
Room 248
Detroit, MI 48226

Your Honor,

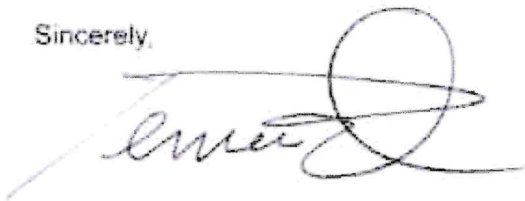
My name is Terrence Bland. I am William Smith's friend and barber. I write this letter in hopes to introduce the man I know and hope the court will show some leniency when sentencing.

I first met William in high school at Benedictine, more than 30 years ago. Over the years, I became a barber and William later became a regular client of mine. Throughout this time Will and I have developed a revered friendship that has seen many great years of support and sound advice. We have supported each other through childhood crises, work-life, and becoming family men.

Will is a loving father, son, husband and friend. He is highly intelligent, passionate about community development, and values community service. It is unfortunate that he has made some poor decisions, thus resulting in his case before you. While I am surprised to hear of his misconduct, I am not surprised that he has accepted responsibility for his actions. My friend has expressed his deep sense of remorse for his serious mistakes. I can say with great authority that William A. Smith will do anything to repay his debt to society and emerge a changed man.

Again, It is my hope that the court takes this letter into consideration at the time of sentencing. I still believe William Smith to be a good human being who will demonstrate his true character.

Sincerely,

A handwritten signature in black ink, appearing to read "Terrence Bland", with a large, stylized loop at the end.

Terrence Bland

Exhibit 8

Character Reference Letter

[REDACTED]

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Re: Character Reference for William Smith

Dear Judge DeClercq,

Throughout the 8 ½ years I have known Will, he has been the most consistent, caring, and loving mentor I have ever had. I attribute a plethora of my successes to his continued wisdom, support and guidance. He encouraged me to continue with my law school journey even though my undergraduate grades were not good and my LSAT scores were low. As a result of his support, I became a first generation law school graduate and am now able to provide for myself and my family.

In addition, he has taught me how to establish strong, safe boundaries with others, my surroundings, and most importantly within myself so I could focus on becoming the best version of myself. Through our connection, I was embedded with the courage to be free of the distractions and negativity we experienced growing up in Detroit. As a young man navigating life on my own I knew how to survive. However, William taught me how to thrive. For that gift, I am forever grateful.

It is my sincere hope this letter is taken into consideration. Although some of his past choices may not reflect him in the best light, those choices do not define him as a human. I still know Will to be a good, loving, valuable member of society who is willing to grow and evolve now more than ever. I believe as we move forward, he will emerge a better person just as he's helped me and countless others achieve the same.

Thank You,
Donovan Jones, J.D.
Donovan Jones, J.D.

Exhibit 9



The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W Lafayette Blvd., Room 248
Detroit Michigan 48226
Re: William Smith

Greetings Honorable Judge DeClercq,

My name is Tanya L Harris and I've known William since we were small children. I've seen him grow and mature for over 50 years. Even though William progressed he always came back to visit. He has always been dependable, respectable and kind.

An example of his character, I remember years ago when my nephew was having problems with his accounting class. I asked William if he could help him. Without thinking twice, he graciously took the time from his busy schedule to be a mentor. William tutored my nephew with patience until he understood. This is one of the many genuine gestures William did with the youth on the block. He drew out the best in my nephew and it was appreciated.

I've known William to be a responsible, caring, honest and courteous man. He is always willing to lend a hand or advise anytime he could. William has good moral character and integrity. I realize given the circumstances you may find it hard to be true but it's true. I, without a doubt, am convinced that William is a decent person.

Although William has made a terrible mistake, I know he is incredibly remorseful, and willing to do whatever it takes to make reparations, for his actions. To do that, he needs the mercy of the courts and the opportunity to have a second chance.

I recognize that William has broken the law. I do not believe that he should get off without punishment. I just hope you will recognize the power you yield regarding the future of a man who has led an exemplary life. I believe in second chances, and I pray that you do too!

Sincerely,

Tanya Harris

Exhibit 10

1/29/2025

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Dear Judge DeClercq:

My name is Patrice Spears, and I am/was an employee for Duo Restaurant and Lounge for 6 years. My boss, William Smith took a chance on me with no waitress experience when no one else would. Not only was the establishment my job but it was like my safe haven. Mr. Smith had a way of making every employee he has hired feel like they mattered and that he cared. Throughout the years of working there, I have watched him work extremely hard to make his establishment successful.

Duo Restaurant and Lounge is one of a kind but so was the owner. I've always had a second job while working for his establishment and he has always been understanding if I arrive later than the rest. He's always wanted the best for us all even outside of being his employee. Rather it's starting a new career, going to school, or any other milestones you could think of he has always been our biggest supporter.

William Smith has inspired so many and has always pushed us to be the best person he knows we can be. Rather you're his family, friend, employee, or even customer, you felt his positive presence. He has a reputation in the community as a person of good character, and I have no doubt that regardless of anything he will continue to be a positive influence on those around him.

I can confirm that in all the time that I've known him, William Smith has been a reliable, trustworthy, and great role model. I would work many more years for him if Duo Restaurant and Lounge was still open. I just hope this letter will give insight regarding his character regardless of the charges against him.

Sincerely,

Patrice Spears

Patrice Spears

Exhibit 11

01/29/2025

Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd. Room 248
Detroit, MI 48226

Re: William A. Smith

Dear Judge DeClercq:

When I talk about William Smith, all I can think of is what type of man he is and his integrity. Will as spoken light into my life since meeting him he has took on a role in my life as a leader I never thought I needed. I never wanted to listen to anyone I always thought I knew everything I was just young and wild. But since meeting William he has changed that side of to become a women & a soon to be mother. William is an astounding man and when I say this I mean no one can tell me anything about his character his charm; his charisma. I never had anyone in my life who always wanted to see someone elevate and do good with themselves outside of my family. When I met him I always asked everybody around me like man why is this man so hard on me always on my head. Until I asked him myself he said "Secret I see so much more for you and I see you excelling in life in ways you probably haven't seen yet". Before meeting William all I could see was tunnel vision. He taught me responsibility. He taught me patience. William is a leader & a man I am happy I came across. I will forever be grateful for him. Working for William I have met A lot of people in positions of power such as LT Governor Garlin Gilchrist. He always motivated me even when I felt like I couldn't do it or want to; when a customer would upset me so bad I would cry William would immediately check the issue. I worked at many places and the way they cared for us as whole would never compare to the way William treated his staff at Duo Restaurant & Lounge. William is not the man the media is trying to paint him out to be. Even on days we were closed he open his door for educational reasons to help young men and woman better themselves. William is a great father, role model, & leader. He has many great characteristics that some words couldn't even describe. His demeanor always was on point & his style is impeccable. William is someone who I admire & appreciate beyond anything imaginable. He is a VERY forgiving and understanding man who like others is human & ALL humans make mistakes. So please find it in your heart to see William as we all have seen him and grew to love him over the years.

Sincerely
Secret Harris

A handwritten signature in black ink, appearing to read 'Secret Harris', written over a horizontal line.

Exhibit 12

01/29/25

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Dear Your Honor,

I am writing this letter on behalf of William A. Smith, who is set to appear before your court. My name is Darlene Adams and I have worked for the Michigan Department of Corrections for 30 years as a probation officer and court liaison. I normally do not write letters of consideration to any court on behalf friends. I understand the seriousness of this offense however I also know the person who is before the court.

I am writing this letter in the hopes that it will help you to see what kind of person William A. Smith is. I have known Mr. Smith for several years as a businessman in the community. And in my brief experience with him, he has been a kind person who has always been willing to help others in need. He has been insightful and even innovative with his business ideas which has helped to create dynamic projects that will be viewed for many years to come. Mr. Smith has always displayed professionalism, has strived to create a better atmosphere for people to enjoy. He was pivotal in the revitalization of this community, and I believe this should also be considered. He is a valuable member of our society and deserves leniency in his current legal situation.

If the court has any further questions or require additional information, please do not hesitate to contact me.

Sincerely,

Darlene Adams

Darlene Adams

Exhibit 13

11/26/24

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Re: William Smith

Dear Judge DeClercq,

My name is Ashley Perry and I was privileged enough to be Mentored by William Smith. He Spent hundreds of hours at his desk answering every minute question I had about any aspect of business and investing. While this case is complicated, The character of William Smith is not. He has done everything in his power to empower the next generation of bright and talented entrepreneurs in the Metro Detroit Eco System. The acumen I acquired under his tutelage made me the iron that sharpens iron, and my goal of Forbes 40 under 40, completely achievable on my own merit. He took us all under his wing, and now we are the wind beneath his. He changed our lives through compassion and leadership, and I pray that you all have compassion toward him in your judgement.

Sincerely,

Ashley Perry

Ashley Perry

Exhibit 14

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Dear Judge DeClercq,

My name is Alliya Johnson and I am writing this letter on behalf of William Smith. I have had the pleasure of working for Mr. Smith at Duo Restaurant & Lounge for approximately two years. Applying for my job I was made aware that they were fully staffed, but Mr. Smith still welcomed me to the family of Duo and made room for me.

I have worked for many different establishments and I have never had a boss like Mr. Smith. A boss that actually cares about your well-being and not only at the workplace. During my employment I experienced nothing but generosity and amiability. He made not only me, but everyone working in his establishment feel of value and made sure we knew that we were important. He accommodated us and helped align schedules in any way when it came to our lives outside of Duo. Rather it was family, health, other jobs, school, etc.

Mr. Smith has been so encouraging and uplifting for the time I've known him and I'm sure all employees, family, friends, customers, and the community can agree. Despite the case, I still believe that William Smith is an upstanding, positive person and I hope you take this letter into consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alliya Johnson', with a stylized, cursive script.

Alliya Johnson

Exhibit 15

January 30, 2025

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Dear Honorable Judge DeClercq,

My name is Jordan Jackson, I am writing to you today to speak on behalf of William Smith, a man I have known for all of my life. He is my god father and I hold him in the highest regard. Will is an exceptional individual who has demonstrated kindness, integrity, and generosity throughout the time I have known him. I hope this letter can help convey his character, as he has had a profound and positive impact on my family and me.

Several years ago, my family faced one of the most difficult challenges in our lives—keeping my mother's home in our family. This house was more than just a property; it was the heart of our family's legacy and history. Unfortunately, we were on the verge of losing it due to my uncle not paying the property taxes. In our most desperate time, Will stepped in and offered help, not only through practical means but also through emotional support and guidance.

Will worked tirelessly with us to navigate the complex options and hurdles we faced. Without his assistance, we would have lost the home that has been a symbol of love and stability for our family. He assisted simply because he genuinely cared about my mother, my family, and what that home meant to us. His selflessness, compassion, and unwavering support have made a lasting difference in our lives.

What stands out the most about Will is his character. He is a man of honor who consistently puts others before himself. Whether helping neighbors in need or providing mentorship to younger people in our community, William always finds ways to give back. His kindness and empathy extend beyond words; he truly acts on his beliefs of supporting those around him.

I am deeply grateful to have William Smith in my life, and I believe the world is a better place because of people like him. I hope that my testimony, along with many others who

have been positively impacted by him, will help demonstrate the remarkable character of the man before you.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jordan Jackson", is written over the printed name.

Jordan Jackson

Exhibit 16

January 30, 2025

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Subject: Letter of Support for William Smith

Dear Honorable Judge Susan K. DeClercq

I hope this letter finds you well. My name is Carlos Medlock, and I am writing to you on behalf of William Smith, who is scheduled for sentencing soon. I humbly ask for a moment of your time to share how profoundly Will Smith has impacted my life and the lives of many others in our community.

I met William Smith when I was 16 years old, during a pivotal time in my life. He became more than just a coach to me—he became a mentor and a father figure. He taught me invaluable lessons about responsibility, integrity, and compassion. His guidance helped me understand what it means to be a man, to raise a family, and to be a positive force in the lives of others.

His influence inspired my own career path, as I now dedicate my life to working with kids, striving to provide the same support and encouragement that he provided to me. His belief in my potential during my teenage years changed the course of my life for the better.


While I understand the seriousness of the situation before the court, I wanted to convey that William Smith has been a source of immense good in my life and the lives of many others. His kindness, mentorship, and unwavering belief in helping others have left a lasting legacy that cannot be overstated.

I respectfully ask for your consideration of his positive contributions and character as you determine the appropriate outcome in this matter. Thank you for taking the time to read my letter and for your service in ensuring justice is served with fairness and compassion.

Sincerely,


Carlos Medlock

Exhibit 17



January 29, 2025

The Honorable Susan K. DeClercq
Theodore Levin US Court House
231 W. Lafayette Boulevard
Detroit, MI 48226

RE: Character Reference for William Smith

Dear Judge DeClercq,

I am writing this letter in support of William Smith, whom I have known personally for many years, and can attest to his character and the positive traits that define him beyond the charges he is facing. Throughout the time I have known him, William has consistently demonstrated a deep commitment to improving the lives of those around him and has done so through his mentorship and leadership.

First and foremost, I would like to acknowledge the seriousness of the offense and the consequences of such actions. However, it is important to share that I have known William to be a thoughtful, generous, and kind-hearted individual, who has always shown genuine concern for others. William has long been a pillar of his community, working tirelessly to create opportunities for individuals who might otherwise struggle to find meaningful employment. Through his business initiatives and community programs, he has helped countless individuals gain financial stability and develop valuable skills that empower them to succeed. His dedication to fostering economic growth in Detroit, I am sure has made a tangible impact on many families who rely on him not only as an employer but also as a mentor and role model.

Beyond his professional endeavors, William has been a dedicated family man, friend, and community member, who consistently prioritizes the well-being of those around him. In every interaction, I have found William to be a compassionate, responsible, and community-oriented individual. His willingness to lend a helping hand, invest in others' success, and strive for the betterment of Detroit speaks volumes about his character.

I believe in William's potential for rehabilitation, and I ask that you consider his past positive contributions as you evaluate his case. Thank you for your time and consideration. Please feel free to contact me if you require any additional information.

Sincerely,

Shereef Telfaire

[REDACTED]

Exhibit 18

11/21/24

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Re: William Smith

Dear Judge DeClercq,

I've been working for Duo for 8 years my family has been involved with him for well over a decade (due to his input in education/athletic influence within the youth of our community that directly impacted my brother and other members of my family.) William gave me an opportunity to work with him at his establishment to provide for my family. Through those years Will has shown me what hard work dedication respect and leadership look like. He has giving me the opportunity to extend opportunities to others. He is a person of forgiveness and of second and third chances. He's a loving father, a man that's there, mentor and a standup guy and a man of opportunity. In 2020 when the world shut down he gave people some hope or a sense or normality. He allowed our staff to work under quarantine within the allowed guidelines to provide for our families where it wasn't available anywhere else. He's a man of understanding and mercy. With a heart of gold and pure spirit he's a giving man. He would give the shirt off his back if needed. His love for others is unconditional I've experienced that firsthand. Through my journey throughout nursing school he pushed for my education to become a better woman and provider for my children. Becoming a better version of my self is top priority and he understood that and pushed that by allowing me to study during work hours. In a normal world that would be frowned upon because business is first. His heart didn't allow him to meet strangers because of his genuine desire to see the good in people is UNMATCHED! Family is what he stood on. His attributes to the community allowed families to enjoy taking peaceful walks on the riverfront while enjoying live entertainment, basketball, Riverdays along with other things. He's a man of bringing communities together in a safe environment. He's more than what the narrative is trying to portray. Will is human just like the rest of us. How many of us aren't humans and haven't made mistakes and are perfect? Yet with acknowledging and perfection how many still strived to help and uplift others at what rate WITHOUT looking for anything in return?

Sincerely,

Javonda Floyd

Javonda Floyd

Exhibit 19

1/29/25

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Re: William A. Smith

Dear Judge DeClercq,

I wanted to take a moment to express how truly wonderful and admirable Will's character is. His kindness, compassion, and selflessness shine through in everything he does, and it is truly inspiring to see.

Will's ability to always put others before himself, to lend a helping hand without hesitation, and to be a source of support and encouragement for those around him is truly remarkable. His positive attitude, resilience, and unwavering optimism in the face of challenges are qualities that I deeply admire.

I have seen firsthand the impact he has had on those around him, specifically myself. As a single mother raising boys it has been tough to say the least. After I shared some of the struggles of raising teenage boys, Will offered me advice that later proved beneficial as his advice helped my boys stay on track. I can confidently say that he is one of the most incredible individuals I have ever had the pleasure of knowing as he chooses to be kind, chooses to care and brings his best energy daily.

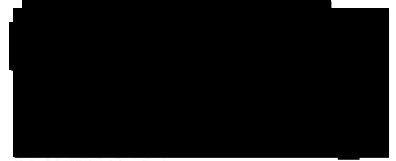
With deep admiration and respect,

A handwritten signature in black ink, appearing to read 'Shanitra Gibson', written in a cursive style.

Shanitra Gibson

Exhibit 20

Antoinette Alexander



Dear Judge DeClercq:

Character Reference
January 29, 2025

Re: William A. Smith
CEO

To: The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

DUO Restaurant & Lounge
29555 Northwestern Hwy
Suite 304
Southfield, MI 48034

I have known William Smith (Will Smith) in a variety of capacities for many years. He has been an Astute Entrepreneur, Businessman, Employer, Friend, and Business Mentor of multiple businesses for the past several years. Additionally, Will Smith is responsible for the Total Operations of business.

Will is Forthcoming, Honest, Efficient, Detail-oriented, Organized, Extremely Competent, Compassionate, and Fair. He almost Always kept his word, and honored many requests. Will is very organized and rarely missed a deadline or forgot a task.

Will also has an excellent rapport with people of all ages. He listened to the concerns of the customers and employees. He has made provision for employees in more ways than one. Will honored and listened to each concern no matter the subject. His excellent communication skills (both written and verbal) allowed him to connect with all kinds of people and continue to inspire them to put forth their best effort to follow their dreams.

In summary, William A. Smith is of Noble Character and always demonstrated Greatness. He has inspired me to be a valuable asset to any company/organization.

Sincerely,

A handwritten signature in cursive script, appearing to read "Antoinette Alexander".

Antoinette Alexander (formerly Perry)
Executive Chef / Kitchen Operations Manager

1/30/25

Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd. Room 248
Detroit MI 48226

Dear Judge DeClercq,

I have been an employee of William's for almost eight years. He has been an amazing boss and true leader to all of us at Duo throughout the years, in addition to being a businessman and CFO outside of our workplace.

Will has always been a fair and honest person as long as I've known him. If there was anything that anybody needed, he wouldn't hesitate to help in any way. He's more than just an employer, his love for his people made him family to me. He truly cares about his employees wellbeing, and has always brought the best out of us, as well as wanting the best for us. He has been a true mentor for me, and I will always appreciate him for all that he has done.

In summary, William A. Smith is a man of honor and integrity, and he has showed me that you can achieve anything as long as you put your mind and your time into it. He has been a true Godsend, and I pray that everyone sees that.

Sincerely,

Jacob Stanley

Jacob Stanley
Sous Chef

06 January 6, 2025

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

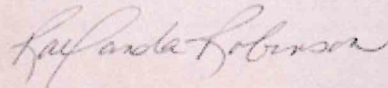
The Honorable Susan K. DeClercq,

My name is Raelanda Robinson and I am writing in reference to Will Smith character. I have known Will for over 35 years. We went to school together at Benedictine High School in Detroit, Michigan. I wasn't popular in high school to me. I was just average. Will never treated me any different whether it was high school or as an adult. It's been some time since I've seen Will since high school until I ran into him at the barbershop several years back. Will took the time to talk to my son about how important his high school years are. He talked to him about his future and he asked him questions about his goals, his career, and his aspirations. My son shared that he was struggling with balancing sports, academics, and what he called his personal life. Will shared with my son that he was a student-athlete and he played basketball in high school and maintained exceptional grades and excelled in sports. Will encouraged my son that it was possible to balance everything (school, sports, and personal life). It was awesome for my son to hear it from somebody else other than myself about the importance of going to school and balance. Will didn't have to take the time to talk to my son and to encourage him to stay focused. It was well appreciated and not solicited.

Everyone makes mistakes there's not one person on this earth that's perfect; however, I know wholeheartedly that Will Smith is remorseful and love his family, his friends and the City of Detroit. I believe he should get a second chance this would not only allow him to repay the debt that he owes the City of Detroit but also regain the respect of the citizens of Detroit, family, and friends.

Thank you for your time and consideration.

Respectfully,



Raelanda Robinson

Raelanda Robinson
[Redacted contact information]

The Honorable Susan K DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, Mi 48226

Regarding William Smith:

I have known the family nearly 50 years and believe Will to be a well respected, kind, sweet and lovable man.

Growing up, we would talk for hours about his goals for college and beyond. He cared greatly for the neighborhood in which we grew up together. I have always known him to be a hard worker and a loving family man.

I was totally shocked and heartbroken over this case because I never saw him going down that path. Today, I still pray for him because in my heart, he is a good man that made a mistake if all charges are true.

Sincerely,

Amanda Brye

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI, 48226

Dear Judge DeClercq,

I am writing this letter on behalf of William Smith, whom I have had the privilege of knowing for over seven years as both my employer and mentor. My name is Mary Wiggins, and I have been employed at Mr. Smith's establishment, Duo Restaurant & Lounge, since moving back to Detroit from Alabama in 2017.

Throughout the years, I have come to know Mr. Smith as an exceptional individual someone who is kind, generous, and always willing to lend a helping hand to those in need. He has not only been a supportive employer but also a guiding presence in my life, offering encouragement and assistance whenever I needed it. His positive influence extends far beyond the workplace, as he has continuously made a meaningful impact on the community and the lives of those around him.

I am deeply saddened by the allegations against him, as they do not reflect the person I have come to know and respect. William Smith is a man of integrity who has dedicated himself to uplifting others, and I felt compelled to share my personal experience and perspective. His kindness and generosity have touched many lives, including my own, and I will always be grateful for the ways in which he has helped me grow both personally and professionally.

Thank you for your time and consideration.

Sincerely,

Mary Katherine Wiggins

A handwritten signature in black ink, appearing to read "Mary Wiggins", with a stylized flourish at the end.

The Honorable Susan K DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, Mi 48226

Regarding William Smith:

I have known Will and family for over 45 years and have always known him to be community focused. His involvement with keeping our beloved friends, who we all consider family, top-of-mind as we deal with life and all that it encompasses. Caring for each other as we deal with death of family members, medical difficulties and wins within our lives. He has been a great friend.

I have always thought of Will (we call him Tony) to be a respectable family man. I have always rooted for him in his life journey as I watched him grow up.

We are all human and prone to mistakes, but I was still completely surprised by the allegations against him because it is so beyond what I would have expected. Regardless, my prayers are with him and his family and that the system will show fairness.

Thanks for taking the time to read this.

Sincerely,

Elletia Asheford

January 27, 2025

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Dear Judge DeClercq,

I've spent the last 7 years working for, and learning from Will Smith. I can honestly say that Will has inspired me step out and start my own business. The environment that he created at Duo has made a great place to work. Working 27 years in the bar scene, and Duo has been the closest staff I've experienced. I've watched him give opportunities to individuals who wanted to better themselves. Duo has become a staple in the community. Customers repeatedly come back to enjoy the Duo experience. A great establishment starts with a great leader, who recognizes the strengths of their employees. And allows them to utilize their abilities and talents in productive way.

Respectfully,

Steve Gaston

Steve Gaston
Head of Security

January 26, 2025

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Re: William A. Smith

Dear Honorable Susan K. DeClercq,

My name is Robyn Frye, and I am in the profession of Food and Beverage. I have known William Smith since 2014. Mr. Smith has always been so loving and caring. I was fortunate to have serviced Mr. Smith, and then more ecstatic that he became my employer. Through the years of knowing William we grew a bond that was equivalent to family.

I am writing this letter to defend William Smith, because he has ALWAYS been a respected person in the community. He is such a genuine person to everyone. I respect Mr. Smith because of his genuine heart, his vision to build, and his background of education graduating from some of the top rated schools in Michigan. I often brag on Mr. Smith to family and friends. It's rare you find a man like him with his background at such a young age. William is definitely a person who has made me want to excel in my future with my career and education.

To give an personal example, I lost my father two years ago and he was very supportive to my family and I. To see him show up to my father's home going service meant so much to me. He has always morally supported my daughter sports activities and schooling.

Apart from that, since knowing Mr. Smith I have grown mentally in a big way. He has put me in contact with some big business names for promotional videos including Fox 2 and Channel 7 news. I look up to him and I am thankful to be connected with William.

It is unfortunate and heartbreaking that Mr. Smith is in this situation. It's clear to me that William will do all that he can do to resolve this situation without further issues.

I hope this letter can in some way convince the court that Mr. William Smith is a good person, and this testimony will be taken in consideration.

Yours truly,

Robyn Frye

Robyn Frye



Date: 1/27/2025

Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd. Room 248
Detroit, MI 48226

Re: Character Reference for William Smith

Dear Judge DeClercq,

I am writing to provide a character reference for William Smith, whom I have worked for at Duo Bar and Grill and I have known for 3 years. I am aware of the charges brought against him and the upcoming court proceedings and I believe it is important to share my perspective on his character and conduct.

I have had the opportunity to observe William Smith unwavering integrity, compassion, and responsibility throughout our work relationship. William has always been a person of high moral character, displaying honesty in all interactions I have witnessed. William has consistently treated everyone that he encountered with dignity, kindness and respect.

Moreover, I observed him fulfill his responsibilities with diligence and dedication. He has displayed a strong work ethic, a commitment to excellence and always goes above and beyond expectations. He is someone that you can really rely on.

Based on my knowledge of William Smith, I firmly believe that the actions in the charges against him are uncharacteristic of his true nature. I genuinely believe that he is a person of integrity. I kindly request the court's consideration of William Smith's overall character and previous contributions to society. I am confident that with support, he will continue to positively contribute to the community.

Thank you for taking the time to review this character reference letter. Should you need additional information or further clarification, please do not hesitate to contact me at the provided contact information.

Sincerely,

Memori Russell

Memori Russell

1/29/25

The Honorable Susan K. DeClercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Dear Honorable Judge DeClercq,

My name is Sparkle Adams. I am writing to provide a character reference for William Smith, whom I have had the privilege of knowing in a professional capacity for the past 6 years. I am aware that Mr. Smith is currently involved in a court case, and I hope to convey my utmost respect for his character and integrity. I have worked with Mr. Smith and have come to recognize him as an individual of exceptional moral character. Throughout our interactions, Mr. Smith has consistently demonstrated qualities that are commendable and noteworthy. He maintains a transparency and forthrightness that fosters trust and respect from those around him. Mr. Smith is known for his high moral character. He treats everyone with respect and dignity, regardless of their position or status. His actions are guided by a strong moral compass, and he serves as a role model within our community and professional circles. He is dependable and responsible, often going above and beyond to assist others and ensure that all tasks are completed with the highest level of integrity. I respectfully ask that the court take into consideration Mr. Smith's good character and the positive contributions he has made to the community when making a decision in this case. I believe that he deeply regrets the actions that have led to this situation and is committed to making amends and moving forward in a positive manner. Thank you for your time and consideration of this letter. Please do not hesitate to contact me if you require any further information.

Sincerely,

Sparkle Adams

Sparkle Adams

11/21/24

The Honorable Susan K. Leclercq
Theodore Levin U.S. Courthouse
231 W. Lafayette Blvd., Room 248
Detroit, MI 48226

Re: William A. Smith

Dear Judge DeClercq,

My name is Devon Johnson and I've had the pleasure of working with Mr. Will Smith for 8 years. My experience with Mr. Smith was always kind, honest, professional and fair. Will and I developed a personal relationship and I often referred to him as my uncle. Mr. Smith was someone I looked up to because he was a man loved by many, a family guy and a man of integrity. I would never imagine Mr. Smith would be in this situation and it's very unfortunate because he is honestly a great guy who loves his community and family.

Sincerely,

Devon Johnson

Devon Johnson